

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

GINA RUSSO,)	CIVIL CASE NO.: 1:21-cv-00703-SM-TSM
)	
Plaintiff,)	
)	
v.)	
)	
NEW HAMPSHIRE NEUROSPINE)	
INSTITUTE, P.A. and)	
URI M. AHN)	
)	
Defendants.)	
)	

**PLAINTIFF GINA RUSSO’S ASSENTED TO MOTION
FOR LEAVE TO EXTEND THE LENGTH OF HER
SUMMARY JUDGMENT MEMORANDUM OF LAW BY SIX PAGES**

Plaintiff Gina Russo’s (“Plaintiff” or “Russo”), by and through her attorney, Kamee Verdrager of KBV Law, hereby submits this Assented to Motion for Leave to Extend the Length of her Summary Judgment Memorandum of Law by Six Pages. In support of her Motion, Plaintiff states as follows:

1. Plaintiff is requesting leave of Court to extend the permitted length of her Memorandum of Law in Support of her objection to Defendant New Hampshire Neurospine Institute, P.A.’s (“NHNSI”) Motion for Summary Judgement by six (6) pages.
2. Per the Court’s November 26, 2024 Order (Doc. No. 77), Plaintiff has been asked to address issues beyond the summary judgment arguments including the effects of the Court’s decision granting summary judgment to the individual defendant, Uri Ahn, and the extent to which that decision will impact the admission of evidence at trial.
3. Plaintiff requests six (6) additional pages to allow her to respond fully to the

Court.

4. Defendant NHNSI assents to this Motion and the relief requested herein.

WHEREFORE, Plaintiff requests that the Court enter an order granting her leave to extend the page limitation for her Memorandum of Law in opposition to Defendant NHNSI's Motion for Summary Judgment by six (6) pages.

Dated: February 24, 2025

Respectfully submitted,

GINA RUSSO

By her attorney:

/s/ Kamee Verdrager
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CERTIFICATION

I hereby certify that on this day a copy of the foregoing was served via CM/ECF on counsel of record.

/s/ Kamee Verdrager
Kamee Verdrager